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September 4, 2008

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PUBLIC SERVICE  
COMMISSION

Stephanie L. Stumbo  
Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
211 Sower Boulevard  
Frankfort, KY 40601

*RE: Case No. 2008-00335—Insight Communications v. Windstream*

Dear Ms. Stumbo:

Enclosed are an original and ten copies of Big River Telephone Company, Inc.'s Motion for Full Intervention in the above referenced case.

Please indicate receipt of these filings by placing your file stamp on the extra copy and returning to me via the enclosed, self-addressed, stamped envelope.

Very truly yours,

STOLL KEENON OGDEN PLLC

Douglas F. Brent

DFB:

Enclosures

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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

INSIGHT PHONE OF KENTUCKY, LLC )  
 )  
COMPLAINANT )  
 )  
v. )  
 )  
WINDSTREAM KENTUCKY EAST, LLC )  
And )  
WINDSTREAM KENTUCKY WEST, LLC )  
 )  
DEFENDANTS )

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PUBLIC SERVICE  
COMMISSION

CASE NO. 2008-00335

**BIG RIVER TELEPHONE'S MOTION FOR FULL INTERVENTION**

Pursuant to 807 KAR 5:001, Section 3(8), Big River Telephone Company, Inc. (hereinafter "Big River Telephone") submits this motion for full intervention in the above-captioned proceeding.

Big River Telephone provides voice services to customers in the Commonwealth of Kentucky and interconnects with Windstream Kentucky East ("Windstream") pursuant to an interconnection agreement approved by this Commission. Big River Telephone competes with Windstream in several communities in Western Kentucky, providing mostly residential service using local loop facilities owned by regional cable television companies. Big River Telephone has provided service this way in Kentucky for more than three years.

Like the Complainant, Insight Communications, Big River Telephone interconnects with Windstream but does not require the use of any local loops provided by Windstream. And like Insight Communication's customers, Big River Telephone's

customers generally “port” their telephone numbers from incumbent local exchange carriers like Windstream. Finally, like Insight Communications, Big River Telephone must dispatch a technician to its subscribers’ premises in order to activate new service using the ported number. Accordingly, it is not possible for Big River Telephone to activate service without a customer’s knowledge and agreement.

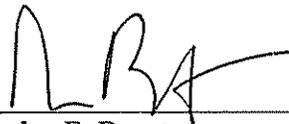
In its Complaint, Insight Communications claims that Windstream has adopted new and unnecessary requirements that interfere with customers’ rights to choose a telephone service provider. Insight Communications claims that as a result it has been unable to port numbers from Windstream.

The Windstream practices described by Insight in its Complaint have had the same detrimental effect on Big River Telephone and customers who have signed up for service with Big River Telephone. Prior to August 1, 2008, Big River Telephone had successfully initiated service to several thousand Kentucky customers without a single customer dispute related to number porting. Since August 1, 2008, Big River Telephone has been unable to complete numerous installs, due to lack of the account number information demanded by Windstream that is irrelevant to any business requirement and typically not committed to a customer’s memory. In other cases, Big River Telephone’s customers have been inconvenienced with a request for the additional information and as a result have had to re-schedule installs. Big River Telephone has communicated its concerns to Windstream, suggesting that the account number information should, at a minimum, be available to Big River Telephone and other CLECs via the Windstream “Express” ordering system. Windstream has not agreed to make the information available.

Big River Telephone's current Interconnection Agreement with Windstream does not include equivalent language to Section 17 of the Insight Communications/Windstream agreement quoted in Paragraph 6 of the Complaint. However, the Commission's disposition of Insight's complaint will no doubt affect how Windstream may interact with Big River Telephone in the future. Thus, Big River Telephone has a special interest in the proceeding not otherwise represented by any party. Participation by Big River Telephone is likely to present issues that will assist the Commission without unduly complicating the proceedings. Therefore, Big River Telephone's interests in this proceeding satisfy the requirements of the Commission's regulation for full intervention. 807 KAR 5:001 Section 3(8)(b). Filings, notices and other papers may be served on undersigned counsel for Big River Telephone.

For the reasons stated above, Big River Telephone asks that this Motion for Full Intervention be granted.

Respectfully submitted,



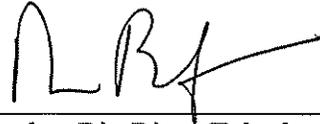
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*Counsel for Big River Telephone Company,  
Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served on the following by first-class United State mail, sufficient postage prepaid, this 4th day of September, 2008.



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